3A-3

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INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
WASTE COMPLIANCE SECTION

Purpose: RCRA Compliance Evaluation Inspection

Facility: Westates Carbon - Arizona, Inc.
2523 Mutahar Street
Parker, AZ 85344

U.S. EPA ID Number: AZD 982 441 263

Date of Investigation: August 17, 1993

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Report Prepared By: Amy Sokolov

Report Date: October 27, 1993

3A-001

INTRODUCTION/BACKGROUND

Westates Carbon - Arizona, Inc. ("Westates") is an interim status carbon regeneration facility located in Parker, Arizona on land owned by the Colorado River Indian Tribes. The facility, which has been operational since August 23, 1992, covers two acres, employs 21 people, and operates 24 hours/day, 7 days/week.

Westates obtained EPA Identification Number AZD 982 441 263 on May 6, 1991 as a Treater, Storer, Disposer of various listed and characteristic wastes. (The Notification of Regulated Waste Activity is included at Attachment #1). The Notification does not indicate any hazardous waste generation activities.

In the February 21, 1991 final rule on the Burning of Hazardous Waste in Boilers and Industrial Furnaces (56 FR 7134) EPA addressed the regulation of carbon regeneration units. EPA clarified that carbon regeneration units are thermal treatment units, subject to RCRA permitting requirements. August 21, 1991, the effective date of the BIF rule, was established as the deadline for submittal of Part A permit applications (56 FR 7201).

On or about August 12, 1991, Westates submitted a Part A permit application to EPA. (Part A permit applications are included at Attachment #2). The August '91 Part A includes:

-S01 (Storage in containers) - 100,000 gallons - 1 unit
  -This represents Westates' container storage area.

-S02 (Storage in tanks) - 35,000 gallons - 5 units
  -T-1 Process Feed Tank
  -T-2 Process Feed Tank
  -T-5 Process Feed Tank
  -T-6 Process Feed Tank
  -T-8 Process Feed Tank (Furnace Feed Tank)

-T04 (Other treatment) - 1,200 lbs/hr - 2 units
  -CRU-1 Carbon Regeneration Unit 1 (currently operational)
  -CRU-2 Carbon Regeneration Unit 2 (not yet constructed)

-T04 (Other treatment) - 45,000 gallons - 1 unit
  -T-9 Recycle Water Storage Tank - used to transfer spent carbon

-T04 (Other treatment) - 35,000 gallons - 1 unit
  -T-12 Rainwater Collection Tank - collects rainwater run-off from warehouse roof and outdoor driveways. Water is used as make-up in T-9.

-T04 (Other treatment) - 35,000 gallons - 1 unit
  -T-11 Industrial Sewer Water Surge Tank - collects scrubber blow-down water for blending prior to discharge to municipal sewer system.

Westates submitted a revised Part A permit application on September 4, 1992, which was returned to Westates for corrections. Westates submitted a revised Part A permit application on or about November 30, 1992. (See Attachment #2). The purpose of this revision was to expand the list of hazardous waste codes so the facility could process a wider range of hazardous spent carbons. Numerous D, F, P, K and U-listed wastes were added in this revision, including F020.

Although process design capacities (Section XII) are unchanged on the November '92 Part A, the estimated annual quantity of waste (Section XIV) was increased from 4,965,000 lbs. on the August '91 Part A to 9,060,000 pounds on the November '92 Part A.

The facility did not amend the Part A permit application for the change of ownership which took place in April 1993 when Westates Carbon was purchased by Wheelabrator Technologies, Inc.

A Preliminary Assessment (PA) on the site was completed on September 21, 1992 and was referred from CERCLA to RCRA.

An Environmental Assessment (EA) was also conducted at this facility. The EA resulted in a Finding Of No Significant Impact (FONSI).

ON-SITE INSPECTION

On the day of the inspection, Jeffrey Walsh, the environmental, health & safety manager was out of town. Monte McCue, the Parker plant manager, explained the process as follows:

All generators wishing to send waste to Westates must first submit a profile sheet with supporting analytical. (See section on Waste Analysis Plan and associated attachments for additional information).

The truck carrying spent activated carbon (hazardous waste) stops at Westates' gate. Jeff Walsh then checks the manifest against the associated profile sheet. A Land Disposal Restriction form (LDR) must accompany the waste. If the LDR is not part of the incoming paperwork, Westates will call the generator or generator's consultant and arrange to receive a copy via facsimile.

The truck then moves to the concrete loading pad. (A diagram of the facility is included at Attachment #3). Approximately half of the waste Westates receives arrives in 55-gallon drums. Shipments comprised of 55-gallon drums are off-loaded from the truck. A visual inspection is done at this point to make sure that the waste is carbon, that the waste is not more than 10% water, and that there is no trash mixed in with the carbon.

The square root of the number of containers in the shipment + 1 is sampled. For example, if a shipment consists of 25 drums, 6

drums would be sampled. Each sample is then individually analyzed in Westates' on-site lab for pH and ignitability. Westates does not accept corrosives. Per Mr. McCue, the pH of the sample is checked with litmus paper. If the litmus paper indicates that the waste may be corrosive, the sample is checked on a pH meter.

Drums are then placed inside the warehouse (Container Storage Area). The original hazardous waste label remains on the drum and a new label is placed on the container as well. The new label identifies the generator, approval number, waste tally number, and date received. Any discrepancies are also noted on this label. A facility representative verifies that the original label matches the contents of the container.

Carbon is also sometimes received in 10,000-lb. roll-off bins or 20,000-lb. slurry trucks. One sample would be pulled from each roll-off bin for pH and ignitability testing. For slurry trucks, one sample is drawn from each dome of the truck.

Waste is fed into the carbon regeneration process via one of two hoppers. Hopper H-1 is used for roll-off bins and Hopper H-2 is used for drums and slurry trucks.

Tank T-9 (Recycle Water Storage Tank) supplies the water required to physically load the waste in to the hopper. There are eductors underneath the hoppers and the process tanks.

The spent carbon is slurried into the process feed tanks (T-1, T-2, T-5, T-6). (These tanks are identified as S02 -- storage tanks -- on the Part A).

From there the carbon is slurried to the furnace feed tank, T-8. Any overflow from T-1, T-2, T-5, T-6 flows into T-9 (Recycle Water Storage Tank). Air displaced from T-1, T-2, T-5, T-6 passes through a carbon adsorber prior to venting.

From T-8, the waste feeds down into a dewatering screw, then passes into a multiple hearth furnace. (See Attachment #4). The furnace is made of 1/4 inch thick steel, is refractory-lined, and is 9'3" in diameter. It has four hearths. The first (uppermost) hearth is not fired. It operates at temperatures of 800-1000F. The second, third, and fourth hearths are fired via natural gas burners at 1.5 million BTUs each, and operate at 1300F, 1550F and 1600F, respectively. As arms within the furnace rotate, the carbon moves from hearth to hearth, finally exiting the furnace as reactivated product.

The reactivated carbon passes into a water-jacketed cooling screw and then into a storage tank. From the storage tank, the carbon is fed into a screener. The screener separates out the fines. Roughly 3% of the product exiting the screener (1,000 - 1,500 lbs/wk) is fines. Fines are "stored on the hazardous side" of the warehouse until Westates can find a "reasonable market" for

them. Mr. McCue estimated that at the time of the inspection, there were approximately 25,000 lbs of fines in the container storage area. These fines had been accumulating in drums and supersacs since August 23, 1992, when the furnace began operating.

For reactivated carbon, Westates gets $.425/lb. for coconut-based carbon and $.475 for coal-based carbon.

Gas coming off the furnace goes through an afterburner (residence time in the afterburner is 1.2-1.7 seconds), and then through a Venturi scrubber and a caustic packed tower and an ID fan. Scrubber water is discharged to the POTW.

The scrubber is currently the bottleneck in the system, as it was sized for approximately half of the capacity Westates now desires. Mr. McCue estimated that the furnace is currently operating at 80% capacity.

WALK-THROUGH

Prior to beginning the walk-through inspection, Westates supplied each inspector with a tyvek suit and protective booties.

The entire facility is enclosed by a 7' chainlink fence which is topped with three strands of barbed wire. Signs were present at the two entrances to the facility which were inspected. (See photo #1. Photographs are included as Attachment #5). The required signs were written in both English and Spanish, and were legible from at least 25 feet away.

Covered Spent Carbon Storage Area - This is the container storage area indicated on Westates' Part A. (This area has interim status for storage of 100,000 gallons of hazardous waste in containers). According to the "Parker Daily Production/Inventory Report", 37,600 pounds of spent carbon were in storage on the day of the inspection. (See Attachment #6). The container storage area is inspected daily. Copies of inspection log sheets are included at Attachment #7.

Fifty-five-gallon drums in this area are routinely stacked 2 high, on pallets. One 55-gallon drum of non-RCRA hazardous waste was observed to be leaning from the second level of palleted drums, and was brought to Mr. McCue's attention.

Eighty 55-gallon drums of reactivated fines were present in this area. (See photo #2). These drums were labelled "Non-Hazardous Waste. Shipper: WCAI, 2328 Mutahar Street, Parker, AZ. Contents: Reactivated Fines". There was no indication of a date on any of the drums or drum labels. Mr. McCue said that these drums should be labelled as hazardous waste as an agreement for the sale of these fines was not yet final.

Also present in this area were drums of spent carbon which were marked to indicate that the profile sheet did not match the incoming waste. This includes the following shipments:

-Chevron. Approval #930360RH. Date received 7/28/93. Waste Tally #030728DM3-8. Expecting vapor, received pellets.

-Shell Oil. July 23, 1993. Approval #930320SH. Waste Tally #030723DM-17. Expecting vapor, received pellets.

-BP Oil Alliance. Received July 1, 1993. Approval #930409RH. Waste Tally #030701DM24-80. Expecting vapor, received pellets.

-Chevron. Pellets. 030727VSC2-9. (Were expecting vapor). (See photos #3, #4).

When Westates receives waste which does not match the profile sheet, they will attempt to resolve the discrepancy within 5 days. If the discrepancy is not resolved within 5 days, the waste is returned to the generator. Mr. McCue explained that the discrepancies for these waste shipments had been successfully resolved. These discrepancies are discussed further in this report (in the Waste Analysis Plan section).

Also observed in this area was a 55-gallon drum with an accumulation of black liquid in its lid. (See photo #5). Ray DeLeon, warehouse lead person, explained that this drum had been underneath a leaking drum. The 8/17/93 inspection log (included at Attachment #7) references the leaking the drum.

Safety equipment observed in this area included one poly overpack drum, tyvek, gloves, goggles, SCBAs, shovels and brooms. (See photo #6).

Twenty-four 55-gallon drums marked as oversize (greater than 10 mesh) carbon (Reactivated carbon. Oversize. 6/14/93) were present in this area. (See photo #7). The bung outlets on the sides of three of these drums appeared to be corroding. (See photos #8, #9). I questioned Mr. McCue as to what the source of the apparent corrosion was. Mr. McCue was unsure as, according to the label, the contents of the drum were a solid material.

At Mr. McCue's request, Ray DeLeon opened one of the apparently corroding drums. (See photo #10). The drum, which was full, contained an accumulation of at least two inches of black liquid. It was determined at this point that the drum contained sump sludge from the recycle water storage tank. Arnold Robbins later observed a Westates employee test the contents of this drum with pH paper. The pH paper identified the pH of the waste as 6-7.
Concrete Loading Pad - On the concrete loading pad were three 55-gallon drums of sulfuric acid (product) stored next to four 55-gallon drums of caustic soda (product). (See photo #11). Although these materials are products, not waste, I indicated to Mr. McCue

that acids and caustics should not be stored together as they are chemically incompatible.

Also located on the concrete pad were a total of 5 roll-off bins (capacity 10,000 lbs. each). (See photo #12). These roll-offs contained waste from the April 1993 clean-out of the Recycle Water Storage Tank. Dates of accumulation marked on these roll-offs ranged from April 13, 1993 to April 27, 1993. The waste in the roll-off bins was identified on the labels as D018 (benzene). (See photo #13). Mr. McCue stated that this waste determination had been based on knowledge rather than testing. The Recycle Water Storage Tank is slated for clean-out again on September of 1993.

Also present on the concrete loading pad was a Baker Tank (#1240). (See photo #14). Mr. McCue explained that they had experienced heavy rains in December and January (approximately 9 inches) and that the Baker Tank was brought on-site in March of 1993 to provide extra rainwater capacity. The tank was marked with the date April 5, 1993. (See photo #15). Westates plans to add this rainwater to their recycle water and work it off.

There was a small amount of standing water on the concrete pad. Westates allows water contained by the pad to evaporate. As per 40 CFR 265.193(c)(4), accumulated precipitation must be removed from the secondary containment system within 24 hours. Cracks were observed in the concrete pad. (See photo #16).

Control Room - See Attachment #9 for a copy of Ray Fox's August 18, 1993 memo describing his findings relative to the furnace.

Process Area - Tanks T-1, T-2, T-5, T-6, T-9 and T-12 as well as the furnace are all located in this area. (See photos #17, #18). A concrete pad underlays this area and the pad is sloped and bermed. Numerous cracks were noted in the concrete pad. (See photo #19). I pointed out several cracks to Mr. McCue and he said that they (Westates) do not have a good solution as to how to fill in the cracks. I also noted that the berm is cracked in several spots, though still intact.

Any liquids released in this area drain to a sump and the sump is pumped to the Recycle Water Storage Tank. Mr. McCue estimated that the sump itself can contain approximately 200 gallons. Included at Attachment #17 are the engineering calculations concerning secondary containment for tankage.

While in the process area, we observed fugitive emissions coming from the top of the dewatering screw.

Safety equipment observed in the Process Area included an emergency eyewash/safety shower (photo #20) and a fire alarm and extinguisher (photo #21).

DOCUMENT REVIEW

A list of documents requested at the time of the inspection is included as Attachment #10.

Contingency Plan

Westates Carbon's Contingency Plan (included as Attachment #11) was reviewed subsequent to the inspection. Deficiencies in the Contingency Plan are identified below:

o Although the Contingency Plan does specify that only employees with 40-hour Health & Safety training should respond to hazardous waste emergencies, the Contingency Plan should clearly state that no employees will respond to a hazardous waste emergency without first donning the appropriate personal protective equipment.

o The Contingency Plan makes numerous references to Westates Carbon management, which must be contacted in the event of an emergency. The Contingency Plan should clarify whether or not this management is located on-site or off-site, and specify how to contact this management.

o Response to fire includes telephoning the C.R.I.T. Fire Department. Table 8-2 Safety and Emergency Equipment includes a fire alarm system. The capabilities of this system should be described in greater detail. It is not clear why the C.R.I.T. Fire Department could not be summoned via fire alarm rather than via telephone.

o Capabilities of the emergency alarm with four actuators are not specified in Table 8-2.

o The number of spare respirators maintained at the facility is not specified in Table 8-2.

o The telephone number for EPA Region 9 identified in the Contingency Plan - 974-8131 - is not current.

o The number of air packs specified in Table 8-2 (two 30-minute packs and one 5-minute pack) is not adequate. A minimum of two people would be required to respond to a hazardous waste emergency. 60-minute air packs should be available to each of the responders, as well as a third person who would be standing by to assist in the event of unforeseen circumstances. Capabilities (intended use) of the 5-minute air pack should also be specified.

Arrangements with local authorities are included at Attachment #12.

Personnel Training

Included at Attachment #13 are a September 20, 1993 letter from Jeff Walsh to myself, describing Westates' personnel training program; training records for Jeff Walsh, Frank McCowen, and Ray DeLeon; and the Westates Training Program (including an Appendix on Personnel Safety).

Table 7-1 in the Westates Training Program identifies job descriptions and corresponding training requirements. Either this table should be revised, or an additional table should be created to identify the actual classes taken by facility personnel (e.g. - Boot Camp, 40-Hour Hazardous Waste Site Worker Training, Hazard Communication Training) rather than the general concepts covered by the training (e.g. - Chemistry of Hazardous Materials and Wastes, Toxicology, Decontamination Procedures).

Training records were reviewed for Jeff Walsh (environmental coordinator); Frank McCowen (operator); and Ray DeLeon (lead warehouse person). Deficiencies were noted in Ray DeLeon's training records in that the form entitled "Westates Carbon-Arizona, Employee Job Description and Training Record" has not been filled out for Mr. DeLeon. Training records documenting that Mr. DeLeon has completed the 8-hour annual refresher training, CPR/First Aid, and Hearing Conservation were **not** present in Mr. DeLeon's file.

Waste Analysis Plan

The Waste Analysis Plan and associated documents are included at Attachment #14. Deficiencies identified in the Waste Analysis Plan are identified below:

o The Waste Analysis Plan does not specify the methods that will be used to meet the additional waste analysis requirements in 40 CFR 265.375. 40 CFR 265.375 requires that the owner/operator determine the heating value of the waste; the halogen and sulfur content in the waste; and the concentrations in the waste of lead and mercury. Question #4 on the Spent Carbon Profile Form which generators sending waste to Westates complete instructs the generator to list all constituents (including halogenated organics) present in any concentration. This is the only reference on the form to halogen content. Sulfur, lead and mercury content are not specifically addressed on the form, nor is heating value.

o The Waste Analysis Plan states that under certain circumstances, an analytical is not required. The Waste Analysis Plan does not specify these certain circumstances. 40 CFR 265.13(a)(1) requires that before an owner/operator treats any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste.

o Process design capacity described on the Part A is

different than the process design capacity described in the Waste Analysis Plan. (Refer to section on Closure Plan for additional information).

o The Waste Analysis Plan states that Method 9040 (electrometric measurement) is used to determine pH. However, during the inspection, Mr. McCue stated that pH paper (Method 9041) is used, and that Method 9040 is only used if the pH paper indicates that the waste may be corrosive. Westates should revise its Waste Analysis Plan to reflect the actual practice.

o The Waste Analysis Plan does not adequately explain how the table of random numbers is used to select random containers for sampling.

o Section 4.0 of the Waste Analysis Plan describes the sampling and analysis of activated carbon. Page 4-1 states that representative samples of activated carbon will be "subjected to the analyses listed in Table 3-2". This appears to be a typographical error as Table 3-2 does not exist. Table 4-1 "Activated Carbon Quality Control Analyses" identifies "Analysis of Extract for Volatile and Nonvolatile Organic Compounds and Metals (TCLP Extraction plus selected organic and inorganic analyses)". The Waste Analysis Plan does not, however, specify the frequency of analysis. Per an October 21, 1993 phone conversation with Jeff Walsh, Westates has not conducted this analysis to date.

If Westates Carbon anticipates the generation of wastes requiring land disposal, they must revise their Waste Analysis Plan to address the waste analysis requirements described in the Land Disposal Restrictions.

o The Waste Analysis Plan and the Part A identify F020 as an acceptable waste. 40 CFR 265.383(a) states that thermal treatment devices subject to Subpart P may only burn F020 if they have received a certification from the Assistant Administrator for Solid Waste and Emergency Response that they can meet the performance standards of Part 264, Subpart O when they burn these wastes. Westates has not obtained such a certification. During the inspection, I brought this to the attention of Mr. McCue who indicated that Westates had become aware of this. Mr. McCue further stated that no F020 had been accepted to date and that Westates would not accept F020. At the time of the inspection, neither the Waste Analysis Plan nor the Part A permit application had been revised to reflect this.

o The Waste Analysis Plan and the Part A identify K111, K124, and K062 as acceptable wastes. The Waste Analysis Plan also states that Westates will not accept corrosive or reactive wastes. K111, K124, and K062 are all corrosive wastes. As per Mr. McCue's undated letter, included at Attachment #17, Westates has never accepted K111, K124 or K062.

o The Waste Analysis Plan also states that if, based on the visual inspection and laboratory screening analyses, the waste is different from that described on the Spent Carbon Profile Sheet and/or the Uniform Hazardous Waste Manifest, the generator will be contacted by phone and notified of the discrepancy. If the discrepancy is not resolved within **five days**, the waste will be rejected and returned to the generator, according to the Waste Analysis Plan.

During the inspection, I observed a number of containers, the labels on which indicated some kind of discrepancy between the profile sheet and the waste itself. I questioned Mr. McCue as to why these containers were still here and was informed that the discrepancies had been resolved.

During document review, I requested documentation concerning correction of discrepancies associated with the above-referenced containers. (Westates refers to such documentation as a letter of correction. Even if the discrepancy is resolved by telephone, there will be written documentation in the file concerning how the discrepancy was resolved). These letters of correction, described below, were provided to me subsequent to the inspection, in an August 23, 1993 letter form Jeff Walsh, Environmental Health and Safety Manager for Westates. (They are included at Attachment #15).

-Chevron, Approval #930360RH. Date received 7/28/93. Waste Tally #030728DM3-8. Expecting aqua, received pellets.
The letter of correction supplied to me by Mr. Walsh concerns a discrepancy associated with an incorrect EPA ID#. It does not address the aqua/pellets discrepancy, although the cover sheet on the packet does note that 8 drums were received 7/28/93.

Thus, EPA has received no information to date supporting Westates assertion that the aqua/pellets discrepancy was resolved within 5 days -- if at all.

-Shell Oil, Approval #930320SH. Date received 7/23/93. Waste Tally #030723DM-17. Expecting vapor, received pellets.
The letter of correction supplied to me by Mr. Walsh does resolve the discrepancy. However, the letter of correction is dated August 23, 1993. Although this waste was identified by the generator as non-RCRA hazardous waste, Westates clearly did not resolve the discrepancy associated with this shipment within the 5-day timeframe specified in their Waste Analysis Plan.

-B.P. Oil Alliance, Approval #930409RH. Date received 7/1/93. Waste Tally #030701DM24-80. Expecting vapor, received pellets.
Westates provided a copy of the BP Oil Alliance file. The file contains documentation concerning the above-referenced

shipments, as well as two others. The cover sheet to the file states for 7/1/93 "Rec'd 80 drums today. See the memo." There was no letter of correction concerning the vapor/pellets discrepancy.

Thus, EPA has received no information to date supporting Westates assertion that the vapor/pellets discrepancy was resolved within 5 days -- if at all.

-Chevron, Waste Tally #030727VSC2-9. Date received 7/27/93. Expecting vapor, received pellets. The letter of correction supplied by Westates indicating that the discrepancy has been resolved is dated August 23, 1993. Thus, Westates did not resolve this discrepancy within the 5-day timeframe specified in its Waste Analysis Plan.

Manifests

Uniform Hazardous Waste Manifests for incoming hazardous waste shipments were spot-checked during the inspection. No discrepancies were identified.

Tanks

Written tank assessments were requested at the time of the inspection. Mr. McCue stated that the assessments have not been completed, but that Westates had recently discovered the need to have these tanks tested. (See Attachment #16 for Rust Engineering Company's July 26, 1993 letter to Mr. McCue concerning tank certifications). In Mr. McCue's September 3, 1993 letter to myself (see Attachment #16), Mr. McCue writes that Westates has accepted a bid proposal and that testing is anticipated during the week of September 13. These tank assessments should be reviewed at the time of Westates' next inspection.

The secondary containment provided for Westates hazardous waste tanks appears to be adequate, based on the engineering calculations included at Attachment #17.

Daily inspection checklists, included at Attachment #7, indicate that Westates is conducting daily inspections of their tank system. However, on three of the six inspection log sheets copied at the time of the inspection, the box for waste feed cutoff systems is marked either "N/A" or with a question mark. (During EPA's October 7, 1993 meeting with Westates facility representatives, Mr. McCue explained that the hazardous waste tanks do have overfill prevention controls. T-1, T-2, T-5, T-6 and T-8 have high and low level carbon alarms and high and low level water alarms; T-9 and T-11 have level sensors, but no alarms. However, the daily inspection checklists do not indicate that the overfill prevention controls are inspected on a daily basis.

Also note earlier problems with the dewatering screw,

including "emissions above dewatering screw" (8/1/93) and "the dewatering screw leaks" (8/3/93). On the day of the inspection, emissions were observed coming from the top of the dewatering screw. However, the inspection log for that day (prepared at 1:30) makes no mention of such emissions.

Inspection Logs

Examples of Westates' Weekly Inspection Checklist and Monthly Inspection Checklist and Operating Log are also included at Attachment #7. The monthly inspection logs indicate that although Westates determined during its 11-3-92 inspection that one SCBA and a 5-minute airpack were in need of refilling, this problem was not resolved until 6 months later (5/7/93).

40 CFR 265.377 requires that stack plume must be observed visually at least hourly for normal appearance (color and opacity). Because this is an <u>hourly</u> requirement, it is not appropriate to record such information on a <u>daily</u> inspection log -- especially since this log is sometimes completed at mid-day.

Operating Record

Westates does not maintain all information required under 40 CFR 265.73, including:

-A description of the quantity of each hazardous waste received and the methods/dates of its treatment, storage and disposal; and

-The location of each hazardous waste within the facility and the quantity at each location. Although Westates maintains some information about the location/quantity of hazardous waste on-site, (see Attachment #6), the level of detail is insufficient.

Closure Plan

The Closure Plan, Closure Cost Estimates, and Financial Assurance are included at Attachment #18.

As in the Waste Analysis Plan, tank capacities identified in the Closure Plan differ from tank capacities identified on the Part A.

Tank	Capacity Identified on Part A	Capacity Identified in Closure Plan
T-1	Total capacity of	11,220 gallons
T-2	Tanks T-1, T-2, T-5,	11,220 gallons
T-5	T-6, and T-8 =	11,220 gallons
T-6	35,000 gallons	11,220 gallons
T-8		1,080 gallons
T-9	45,000 gallons	25,080 gallons
T-11	35,000 gallons	19,080 gallons
T-12	35,000 gallons	25,080 gallons

In EPA's October 7, 1993 meeting with Westates facility representatives, Mr. McCue stated that the correct tank capacities are those that appear in the Closure Plan. The Part A should be revised accordingly.

The Closure Plan (p.9) states that the dewatered fines will have been treated by reactivation and will be subsequently sold as powdered activated carbon for reuse. This statement should be revised to reflect the possibility that the fines may be shipped for off-site disposal, as is assumed in the closure cost estimate.

The Closure Plan does not identify the method of treatment/disposal of scrubber packing materials.

Closure Cost Estimates/Financial Assurance

The closure cost estimate assumes three people will be needed to close the facility. However, personnel training documents supplied by Westates (see Attachment #13) state that 14-18 people are required to operate Westates. Accordingly, this figure should be used in closure cost estimates.

Treatment and/or disposal costs of scrubber packing materials should also be factored in to the closure cost estimate.

Attachments

1 Notification of Regulated Waste Activity

2 Part A Permit Application - 8/12/91
Part A Permit Application - 11/30/92

3 Facility Map

4 Diagram of Westates Multiple Hearth Furnace

5 Photographs

6 Parker Daily Production/Inventory Report

7 Inspection Log Sheets

8 Confidential Business Information

9 Ray Fox Memo - August 18, 1993

10 List of Documents Requested at the Time of the Inspection

11 Contingency Plan

12 Arrangements with Local Authorities

13 Personnel Training

14 Waste Analysis Plan

15 Letters of Correction
-Chevron
-Shell
-BP Oil Alliance
-Chevron

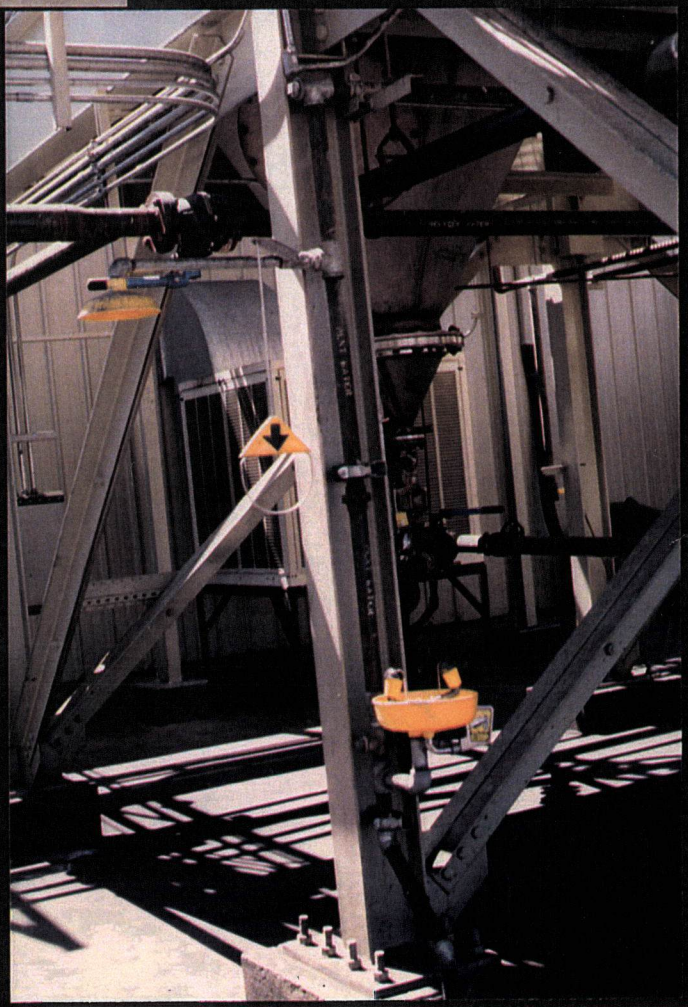
16 -Rust Engineering Company Letter - July 26, 1993
-Monte McCue Letter - September 3, 1993

17 Monte McCue Letter (undated) transmitting Secondary Containment Calculations

18 Closure Plan
Closure Cost Estimates
Financial Assurance

#19 - Process Area. Numerous cracks were observed inthe concrete underlaying the Process Area.

1993



#20 - Process Area. Emergency eyewash and safety shower.

#21 - Process Area. Fire alarm and extinguisher.